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**UNITED STATES BANKRUPTCY COURT**

**CENTRAL DISTRICT OF CALIFORNIA—SANTA ANA DIVISION**

In re  
  
2ND CHANCE INVESTMENT  
GROUP, LLC,  
  
Debtor.

CASE NO.: 8:22-bk-12142-SC

**STATUS REPORT AND STATEMENT  
OF NO OPPOSITION FILED TO THE  
MOTION FOR APPROVAL OF TWO  
STIPULATIONS FOR RELIEF FROM  
THE AUTOMATIC STAY UNDER 11  
U.S.C. §§ 362(d)(1) AND 362(d)(2)  
FOR:**

**1. (ECF #365) 1611 A & B 151ST  
AVENUE, SAN LEANDRO, CA 94578,  
APN NO. 080-0022-032-00; and**

**2. (ECF #366) 1004 PEACHWOOD  
COURT LOS BANOS, CA 93635, APN  
No. 082-282-031**

Date: March 13, 2024  
Time: 1:30 P.M.  
Judge: Hon. Scott C. Clarkson

United States Bankruptcy Court  
411 West Fourth Street  
Suite 5130 / Courtroom 5C  
Santa Ana, CA 92701-4593  
(Via Zoom.gov)

**TO THE HONORABLE SCOTT C. CLARKSON, UNITED STATES  
BANKRUPTCY COURT JUDGE, THE DEBTOR, DEBTOR'S COUNSEL, AND  
OTHER INTERESTED PARTIES:**

On February 2, 2024, as ECF 368, Creditors Lantzman Investments, Inc. and LMF2, LLC. (collectively "Creditors"), by and through their counsel, filed their Motion ("Motion") to Approve two Stipulations with the Debtor for relief from the automatic stay under 11 U.S.C. §§ 362(d)(1) and 362(d)(2) for: (1) (ECF #365) 1611 A & B 151ST AVENUE, SAN LEANDRO, CA 94578, APN NO. 080-0022-032-00 and (2) (ECF #366) 1004 PEACHWOOD COURT LOS BANOS, CA 93635, APN No. 082-282-031. On February 2, 2024, the Motion was noticed for hearing (ECF #370) on March 13, 2024 at 1:30 p.m., and was served on all creditors and parties in interest. This Court set the Motion for hearing on that date and at that time. ECF #380.

The last date for anyone to oppose the relief requested was February 28, 2024. A review of the docket in this case reveals that no one has filed any opposition to the Motion. As a result, Creditors respectfully request that this Court grant the Motion as prayed and permit it to upload orders granting the Motion and approving the two Stipulations (ECF #s 365 and 366).

Respectfully submitted,

Dated: March 1, 2024

FENNEMORE LLP

By: /s/ Kathleen A. Cashman-Kramer

Gary B. Rudolph  
Kathleen A. Cashman-Kramer  
Attorneys for Secured Creditors  
Lantzman Investments, Inc. and LMF2 LLC

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 600 B Street, Suite 1700 San Diego, CA 92101

A true and correct copy of the foregoing document entitled (*specify*):

**STATUS REPORT AND STATEMENT OF NO OPPOSITION FILED TO THE MOTION FOR APPROVAL OF STIPULATION FOR RELIEF FROM STAY (ECF #234) 37915 MARSALA DR., PALMDALE, CA 93552, APN NO. 3023-073-011; FOR APPROVAL OF STIPULATION FOR RELIEF FROM STAY (ECF #233) 730 & 732 East 78<sup>th</sup> STREET LOS ANGELES, CA APN NO. 6023-031-025; and FOR APPROVAL OF STIPULATION FOR RELIEF FROM STAY (ECF#232) 43933 30<sup>th</sup> STREET EAST, LANCASTER, CA 93535 APN NO. 3150-050-021; MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT**

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) 03/01/2024, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Amanda G. Billyard abillyard@bwlawcenter.com
- Stephan M Brown ECF@thebklawoffice.com, stephan@thebklawoffice.com;roslyn@thebklawoffice.com
- Kathleen A Cashman-Kramer cashman-kramer@sullivanhill.com, theresam@psdslaw.com
- Dane W Exnowski dane.exnowski@mccalla.com, bk.ca@mccalla.com,mccallaecf@ecf.courtdrive.com
- Lazaro E Fernandez lef17@pacbell.net, lef-sam@pacbell.net;lef-mari@pacbell.net;OfficeLR74738@notify.bestcase.com;lefkarina@gmail.com
- Robert P Goe kmurphy@goeforlaw.com, rgoe@goeforlaw.com;goeforecf@gmail.com
- David M Goodrich dgoodrich@go2.law, kadele@wgllp.com;lbracken@wgllp.com;wgllp@ecf.courtdrive.com;gestrada@wgllp.com
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- Brandon J Iskander biskander@goeforlaw.com, kmurphy@goeforlaw.com
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- Cheryl A Skigin caskigin@earthlink.net, caskigin@earthlink.net
- Richard L. Sturdevant rich@bwlawcenter.com
- United States Trustee (SA) ustpreion16.sa.ecf@usdoj.gov
- Christopher P. Walker cwalker@cpwalkerlaw.com, lhines@cpwalkerlaw.com;r57253@notify.bestcase.com
- Fanny Zhang Wan fwan@raslg.com
- Andy C Warshaw awarshaw@bwlawcenter.com, warshaw.andyb110606@notify.bestcase.com
- Jennifer C Wong bknotice@mccarthyholthus.com, jwong@ecf.courtdrive.com

**2. SERVED BY UNITED STATES MAIL:**

On (date) 03/01/2024, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

**Judge – Courtesy Copy**

Honorable Scott C. Clarkson  
United States Bankruptcy Court  
Central District of California  
Ronald Reagan Federal Building and Courthouse  
411 West Fourth Street, Suite 5130 / Courtroom 5C  
Santa Ana, CA 92701-4593

**Residents of Real Property**

Shawn Southern  
1611 151st Avenue  
San Leandro CA 94578  
  
Rosendo Quiroz Estroga  
1004 Peachwood Court  
Los Banos, CA 93635

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL**  
(state method

for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date)

, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.



Service information continued  
on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.  
03/01/2024                      Laurel Dinkins                      /s/ Laurel Dinkins  
Date                                      Printed Name                                      Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

June 2012

**F 9013-3.1.PROOF.SERVICE**